

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Bohdan Makuch Debtor	Chapter 13 Bankruptcy No. 16-17722-MDC
Urban Financial of America, LLC, or its Successor or Assignee Movant	
vs.	
William C. Miller, Esq., Trustee Bohdan Makuch Respondents	

**MOTION OF URBAN FINANCIAL OF AMERICA, LLC, OR ITS SUCCESSOR OR
ASSIGNEE FOR RELIEF FROM AUTOMATIC STAY UNDER § 362(a)**

Movant: Urban Financial of America, LLC, or its Successor or Assignee

Reverse Mortgage and Note dated October 1, 2012 and recorded in the Office of the Recorder of Montgomery County in Mortgage Book 13451 Page 00096. A true and correct copy is attached hereto as Exhibit "A."

Assignment of Mortgage dated March 10, 2015 and recorded in the Office of the Recorder of Montgomery County in Mortgage Book 13911 Page 02829. A true and correct copy is attached hereto as Exhibit "B."

1. Urban Financial of America, LLC, or its Successor or Assignee (hereinafter "Movant") holds a claim secured by a duly recorded Mortgage on property of Bohdan Makuch, or of the bankruptcy estate located at: 1851 Meadowbrook Road, Abington, Pennsylvania 19001.

2. Bohdan Makuch (hereinafter "Debtor") filed a Petition under Chapter 13 on November 1, 2016.

3. As of August 21, 2017, there is no monthly payment required, as this is a Reverse Mortgage.

4. As of August 21, 2017, the following is an itemized statement of the amounts due under the mortgage loan:

Maximum Principal Amount	\$400,500.00
Principal Balance	\$38,122.52
Interest Accrued	\$58,063.34
MIP	\$14,343.62

5. Under the terms of the reverse mortgage, Debtor is wholly responsible for taxes and insurance on the property. As of March 15, 2017, the movant has advance a total of \$5,424.20 in taxes, figures are broken down as follows:

Date of Payment	Tax Type	Amount Advanced
07/13/2017	County Tax	\$5,424.20

6. Movant has not received payment for advances made and lacks protection of its interest.

7. As of August 21, 2017, Movant has incurred attorney's fees in the amount of \$850.00, and costs in the amount of \$181.00 in connection with this Motion.

8. Movant does not have and has not been offered adequate protection for its interest in said premises and may be required to pay expenses for said premises in order to preserve its lien, which is the obligation of the Debtor under said Mortgage.

WHEREFORE, Movant prays for an order modifying the automatic stay of Bankruptcy Code §362(a) to permit Movant to exercise applicable state court remedies with respect to the mortgage property and for such relief as this Court deems necessary and appropriate.

/s/ Ann E. Swartz

ANN E. SWARTZ, ESQUIRE, I.D. # 201926
CELINE P. DERKRIKORIAN, ESQUIRE - ID # 313673
ALEXANDRA T. GARCIA, ESQUIRE - ID # 307280
Attorney for Urban Financial of America, LLC
123 South Broad Street, Suite 1400
Philadelphia, PA 19109
Telephone: (215) 790-1010
Facsimile: (215) 790-1274
Email: ecfmail@mwc-law.com